

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

EX PARTE APPLICATION OF
IRAQ TELECOM LIMITED FOR AN
ORDER TO OBTAIN DISCOVERY FOR
USE IN FOREIGN PROCEEDINGS
PURSUANT TO 28 U.S.C. § 1782

Case No. _____

IRAQ TELECOM LIMITED'S EX PARTE APPLICATION PURSUANT TO 28 U.S.C. § 1782 FOR AN ORDER TO TAKE DISCOVERY FROM DECHERT LLP FOR USE IN FOREIGN PROCEEDINGS

Iraq Telecom Limited (“**Iraq Telecom**” or the “**Applicant**”), pursuant to 28 U.S.C. § 1782 and the Federal Rules of Civil Procedure 26, 34 and 45, respectfully requests that this Court grant Iraq Telecom’s *ex parte* application seeking an order in the form attached as Exhibit 4 to the declaration of Kristin N. Tahler (“**Tahler Decl.**”) authorizing Iraq Telecom to obtain certain limited discovery¹ for use in (1) a pending arbitration administered by the International Chamber of Commerce; and (2) a contemplated proceeding in the United Kingdom.

In support of this application, Iraq Telecom submits a Memorandum of Law and the appended sworn declarations of (1) Cyrus Benson; (2) Nicholas Bortman; (3) Matthew Bunting; (4) Ehab Fekri Aziz Bassilius; and (5) Kristin Tahler, with accompanying exhibits.

* * *

¹ See Tahler Decl., attached hereto as Appendix D, at Exhibits 2 & 3.

Dated: November 5, 2019

By:

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**Pro Hac Vice* to be submitted.

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